

9 Box 3 - [JGR/Appointee Clearances – 05/03/1983-05/04/1983] -
Roberts, John G.: Files SERIES I: Subject File

WITHDRAWAL SHEET

Ronald Reagan Library

Collection Name Roberts, John

Withdrawer

KDB 7/28/2005

File Folder [JGR/APPOINTEE CLEARANCES - 05/03/1983-05/04/1983]

FOIA

F05-139/01

Box Number

COOK

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Freedom of Information Act - [5 U.S.C. 552(b)]

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2 LETTER

3 4/22/1983 B6

230

SEELEY LODWICK TO MICHAEL STEIN

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UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, D.C. 20436

April 29, 1983

John G. Roberts, Esq.
Associate Counsel to the President
The White House
Washington, D.C. 20500

Re: Seeley G. Lodwick

Dear Mr. Roberts:

We have reviewed Mr. Lodwick's letter of April 22, 1983, describing his farm holdings and his intended activities as trustee of the William G. Lodwick trust. Based on the representations made in the letter, we determine that Mr. Lodwick's activities would not be contrary to the provisions of 19 U.S.C. § 1330(c)(5).

Although consideration of a waiver under 18 U.S.C. § 208(b) is somewhat premature prior to Mr. Lodwick's confirmation, we note that the Commission has infrequently conducted investigations regarding the kinds of agricultural products raised on the properties in which Mr. Lodwick holds an interest.

If I can be of further assistance in this matter please do not hesitate to contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael P. Mabile", is written below the word "Sincerely,".

Michael P. Mabile
Deputy Ethics Counselor

cc: Jane Ley, Esq.
Office of Government Ethics

THE WHITE HOUSE

WASHINGTON

April 22, 1983

MEMORANDUM FOR MICHAEL STEIN
GENERAL COUNSEL
INTERNATIONAL TRADE COMMISSION

FROM: JOHN G. ROBERTS
ASSOCIATE COUNSEL TO THE PRESIDENT

SUBJECT: Seeley G. Lodwick

I attach for your information a copy of a memorandum from the Office of the General Counsel, Federal Trade Commission, concerning 15 U.S.C. § 41, an analogue of 19 U.S.C. § 1330(c)(5). I also attach a copy of a letter from the General Counsel of the Civil Aeronautics Board concerning, in part, the applicability of 49 U.S.C. § 1321(b) -- also an analogue of 19 U.S.C. § 1330(c)(5) -- in the context of an FCC licensee who relinquished daily operation of his stations but, under FCC rules, retained ultimate control of them.

Attachments

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3 MEMO

3 7/19/1982 B6

1132

BARRY RUBIN TO JACK CARLEY, RE
RESTRICTIONS ON OUTSIDE ACTIVITY OF A
COMMISSIONER

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NO Document Description

4 LETTER

6 7/20/1978 B6

231

GERALD NORTON TO HOWARD CANNON RE
INFORMATION SUPPLIED FOR CONFIRMATION
HEARING

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5 LETTER

6

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B6

232

LEON ULMAN TO H. CANNON RE POTENTIAL
CONFLICTS OF INTEREST

Freedom of Information Act - [5 U.S.C. 552(b)]

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6 LETTER

3 12/9/1977 B6

233

L ULMAN TO WARREN MAGNUSON RE
POTENTIAL APPOINTEE

Freedom of Information Act - [5 U.S.C. 552(b)]

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7 LETTER

4 6/1/1977 B6

234

L. ULMAN TO WARREN MAGNUSON RE
POTENTIAL APPOINTEE

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ATTACHMENT E

Department of Justice
Washington, D.C. 20530

29 SEP 1976

Honorable Frank E. Moss
Chairman, Subcommittee for Consumers
Senate Committee on Commerce
Washington, D. C. 20510

Dear Senator Moss:

This is in response to your letter of September 20, 1976, asking that we reconsider one aspect of our opinion regarding potential conflict of interest problems or other legal impediments to the service of Thaddeus Garrett as a Member of the Consumer Product Safety Commission. Specifically, you question the statement in our September 13 letter to Senator Magnuson that Mr. Garrett's service as an associate pastor of the Wesley Temple A.M.E. Zion Church in Akron, Ohio, "would seem to constitute engaging in another 'business, vocation, or employment,' which is prohibited by 15 U.S.C. § 2053(c)."

Mr. Garrett has informed us orally that he has regular responsibilities as associate pastor, including officiating at church services on two or three Sundays each month and at occasional wedding and funeral ceremonies on Saturdays or Sundays. Such activities by an ordained minister -- which Mr. Garrett is -- seem to us to constitute engaging in a "vocation" within the ordinary meaning of that word. They are the type of activities, for example, of which many persons make a professional career. We do not believe that 15 U.S.C. § 2053(c) is nevertheless inapplicable in the present context merely because Mr. Garrett receives no compensation for his work.

The Committee reports and debates on the Consumer Product Safety Act of 1972 are silent as to the legislative purpose in prohibiting Members from engaging in any outside

business, vocation, or employment. This provision was first contained in draft legislation submitted in 1970 as part of the Final Report of the National Commission on Product Safety, which was established to study the need for Federal legislation in the area. See Hearings on the Consumer Product Safety Act before the Subcommittee on Commerce and Finance of the House Interstate and Foreign Commerce Committee, 92d Cong., 1st & 2d Sess. 319, 503 (1972). The Final Report contains no discussion of the recommended provision, and it was apparently adopted without question by the Congress in the legislation that was finally enacted. Any analysis of legislative intent must therefore be speculative and, indeed, somewhat artificial.

The prohibition in 15 U.S.C. § 2053(c) was no doubt borrowed by the National Commission from comparable provisions in statutes governing other independent regulatory agencies. See, e.g., 15 U.S.C. § 41 (FTC); 16 U.S.C. § 792 (FPC); 47 U.S.C. § 154(b) (FCC); 49 U.S.C. § 11 (ICC). Unfortunately, there are no published opinions construing these provisions which might be of help here.

We have not undertaken an exhaustive study of the legislative history of these earlier statutes, although we did unearth a statement in the Senate debates concerning the comparable provision in the Interstate Commerce Act, which was apparently the grandfather of them all, to the effect that Commissioners were to have "no other business . . . thus necessitating . . . an income limited to the amount named in the bill." 17 Cong. Rec. 3477 (1886). We do not read this to mean that limiting a Commissioner's income to his authorized salary is necessarily the only purpose of the ICC provision, however. For one thing, it does not even effectively limit a Commissioner's income to his Government salary, because Commissioners may still receive income from securities of companies not regulated by the ICC. 49 U.S.C. § 11. In any event, we do not attach much significance to this fleeting reference in the legislative history of an essentially unrelated act passed almost 90 years ago in view of the fact that there is no indication that later Congresses, including that which passed the Consumer Product Safety Act, ever gave any thought to the precise meaning of the prohibition. We think it equally if not

more plausible that those who voted for the later provisions, and perhaps even the ICC provision as well, believed that members of independent regulatory commissions should be prohibited from engaging in any outside business, vocation, or employment in order to minimize professional diversions and thereby to focus their energies on official duties. Under this interpretation, even uncompensated outside activities of such a nature must be prohibited, since they too might detract from a member's performance of his official duties. ✓

The Supreme Court has stated that one of the justifications for establishing regulatory commissions comprised of members having a fixed statutory term is to foster independence and to enable the members to develop expertise during their tenure. Humphrey's Executor v. United States, 295 U.S. 602, 625-26 (1935). Limiting outside activities of members, whether compensated or not, is consistent with this purpose.

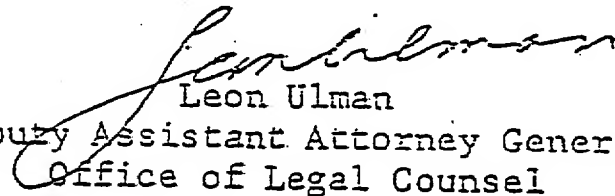
Our conclusion that the prohibition in 15 U.S.C. § 2053(c) applies to uncompensated outside activities also finds support in the fact that the President is authorized to remove any Member of the Consumer Product Safety Commission "for neglect of duty or malfeasance in office." 15 U.S.C. § 2053(a). This section too reflects a concern that Members not be distracted from their official responsibilities.

Finally, we have been advised on an informal basis by several of the other independent regulatory agencies that the matter of compensation would not be regarded as controlling in determining whether outside activities by members would violate comparable prohibitions against engaging in any other business, vocation, or employment. In fact, we were informed that a member of one such agency who also happened to be a minister was orally advised under circumstances quite similar to those involved here that he should cease servicing his congregations when he became a member, and we understand that he did so.

The conclusion that uncompensated services are covered seems quite sound if reference is made to some of the other

situations in which the issue could arise. We assume that there would be agreement, for example, that a Member of the Consumer Product Safety Commission would be prohibited by 15 U.S.C. § 2053(c) from devoting his weekends to practicing law without compensation for a local legal services organization or teaching or consulting on a regular basis for free. In our view, the same rule should apply to the ministry.

Sincerely;


Leon Ulman
Deputy Assistant Attorney General
Office of Legal Counsel

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8 LETTER

3 9/28/1981 B6

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DAVID KIRSTEIN TO J. JACKSON WALTER RE
NOMINEE'S FINANCIAL INTERESTS

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U.S. SENATE,
Washington, D.C., March 30, 1981.

Subcommittee on Environment, Soil Conservation,
Agriculture, Russell Senate Office Building,

could arrange for Mr. John B. Crowell, Jr.,
in record, the enclosed questions relating to
the Department of Agriculture.

GARY HART.

ere to follow:]

ry overseeing the Forest Service, you will
22 percent of Colorado's land which is in
in philosophy for the management of that

hy of multiple use management.
ts of interest between your current position
chasing the most timber from the national
stary overseeing the national forests? What
on matters coming before you which affect

have divested myself of all stock ownership
tally severed employment connections with
have I sought any assurance of reemploy-
r any other company. Any appeals to which
will not be resolved by me. I have taken all
s in Government Act of 1978.

ned Louisiana Pacific \$1.5 million for anti-
luring your tenure as the company's chief
timber from national forest lands in Alaska.
he court found to be illegal, and if so, what

the cited lawsuit which is a civil antitrust
ment in the case was limited to approving
hikan Pulp Company of defense counsel for
g status reports from such counsel respect-
f the case. From time to time preceding and
ich counsel in a number of meetings and
actics and strategy.

e Administration has targeted for adminis-
regulations on the land management plans
ement Act of 1976. What is the purpose of
ervice play in this review? What effect will
agement plans the Forest Service is now

ment Act (NFMA) was enacted in 1976. It
to set out standards and guidelines for land
191 million acres of National Forest System
e completed by September 30, 1985. For the
en implementing the regulations developed
Vice President's Task Force on Regulatory
is as a possible target for review simply
the regulations. I doubt that much substan-
o result.

regulations during this review. It is expect-
will not cause any significant reworking of
of the review is to simplify the procedures

on the Clean Air Act's provisions strictly
ution or visibility impairment of "Class I"
ongress before 1977)? Do you think Congress

Answer. In general, I support the provisions of the Clean Air Act relative to limiting visibility impairment for areas designated as wilderness as of the effective date of the Act. The Act contains substantial flexibility. I am concerned that interpretation of the Act could be too strict. For example, designation of integral vistas outside wilderness areas does not appear to be required. A clarification of intent by the Congress would be helpful.

Question 6. What is your position on the wilderness recommendations which were submitted by the previous Administration following the Forest Service's roadless area review and evaluation (RARE II), but which have not yet been acted on by Congress?

Answer. For the most part the RARE II recommendations provide a good starting point for Congressional consideration. We expect Congress to continue its consideration as to which lands should be designated as wilderness. As requested, we will provide Congress specific recommendations on individuals bills.

Question 7. In the Colorado Wilderness Act of 1980, the Forest Service directed to conduct 10 wilderness studies "in accordance with subsections 3(c) and 3(d) of the Wilderness Act of 1964." Will the Forest Service, in conducting these studies, follow the current regulations and practices established under sections 3(c) and 3(d) of the Wilderness Act?

Answer. Yes.

Question 8. The Colorado delegation and other interested members of Congress developed last year statutory provisions on the "release" of national forest lands which had been studied for possible wilderness designation RARE II. These provisions were included in the Colorado, New Mexico, and Alaska wilderness bills. Do you support these provisions? Would you support the inclusion of the same or different "release" provisions in any additional legislation based on RARE II?

Answer. a. Yes, we support the objectives of these provisions in seeking to resolve the status of roadless areas; b. We expected that release language will be included in any bills developed in the 97th Congress. We will respond to these proposals as they are developed.

Question 9. The conference report accompanying the Colorado Wilderness Act specifically identified five areas which had been recommended for wilderness designation by the previous Administration but were rejected by Congress. The conferees directed that these areas should be made available for non-wilderness multiple use. Will the Forest Service, under the new Administration, continue to follow this directive?

Answer. Yes.

Question 10. In the Colorado Wilderness Act, Congress directed the Forest Service to administer and interpret the provisions of the Wilderness Act relating to grazing in accordance with the guidelines on grazing policy and practices which were developed in conjunction with the Colorado bill and included in the House of Representatives committee report accompanying the bill. These guidelines have subsequently been included in the Forest Service Manual and are being followed by agency officials. Do you support these guidelines and their continued implementation?

Answer. Yes.

BIOGRAPHICAL INFORMATION OF SEELEY G. LODWICK, UNDER SECRETARY OF AGRICULTURE FOR INTERNATIONAL AFFAIRS AND COMMODITY PROGRAMS—DESIGNATE

Seeley Lodwick was nominated for the position of Under Secretary of Agriculture for International Affairs and Commodity Programs on March 17, 1981.

Lodwick was born October 19, 1920 in Evanston, Illinois. He received his B.S. degree in agricultural economics from Iowa State University in 1942. He served in the U.S. Marine Corps from 1942 to 1945, when he was discharged as a lieutenant. From 1945 until 1969 Mr. Lodwick was engaged in various farming activities, including livestock; both dairy and beef, along with hogs; and grains—corn, soybeans, and wheat.

In 1969 he assumed the responsibility of Director, Conservation and Land Use Division, ASCS. In 1970 he became Secretary of the Commodity Credit Corporation, and Executive Assistant to the Administrator of ASCS. Leaving that post in 1973, Mr. Lodwick became Director, Government Relations, American Farm Bureau Federation, Washington, D.C., and served in this capacity until 1976 when he was named Assistant Administrator for ASCS in the Department of Agriculture. From 1979 until his nomination Mr. Lodwick served as Iowa Administrator for Senator Roger W. Jepsen (R-Iowa).

Mr. Lodwick is married to Helen (Pat) Barbre and they have three daughters.

With the exception of the farming and farm-related or ly hold. I will also refrain fr services of any kind, in co operations, or other busine

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9 MEMO

1 4/22/1983 B6

1133

ROBERTS TO MICHAEL STEIN, RE SEELEY G.
LODWICK

Freedom of Information Act - [5 U.S.C. 552(b)]

B-1 National security classified information [(b)(1) of the FOIA]

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10 LETTER

3 4/22/1983 B6

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LODWICK TO STEIN

Freedom of Information Act - [5 U.S.C. 552(b)]

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tion and Forestry.

the Ethics in Government Act of 1978, I report filed by Seeley G. Lodwick. Presi- for the position of Under Secretary for ums, Department of Agriculture. and advice from the B.

advice from the Department of Agriculture of the agency's functions and the reports from the agency and Mr. Lodwick report. We note that by his letter, Mr. [redacted] in order to resolve issues relating to the agency concerning a waiver under necessary and appropriate in this case. [redacted] coming.

referred to above and the waiver determine in compliance with applicable laws

J. JACKSON WALTER, *Director.*

DEPARTMENT OF AGRICULTURE,
OFFICE OF THE SECRETARY,
Washington, D.C., March 5, 1981.

SF-278, Financial Disclosure Report, of Under Secretary of Agriculture, which I have signed as this is in Government Act of 1978. Also detailing the steps he has agreed to take to avoid or apparent conflict of interest in his duties he will perform as Under Secretary of Agriculture. The financial interests disclosed in the SF-278 have been agreed to take, the report laws and regulations.

rt discloses no present conflicts of
ial interests and the duties he will
is nonetheless apparent to me that
s tenure as Under Secretary which,
could well rise to actual or appar-
in which the Under Secretary is
ntially on a regular basis, any of
ce of conflict of interest, include,
s of U.S. agricultural commodities,
g imports of meat products from
rates and target prices for corn,

rs are so varied and extensive, I
o issuance of a determination for
8(b), that his financial interests in
al as to be deemed likely to affect
s Under Secretary of Agriculture.
steps which should be expected of
interest or appearance thereof, I
uld foreclose the possibility that
e of the full range of duties as
sternational Affairs and Commod-

JOHN W. FOSSUM,
and Designated Agency Official.

Hon. J. JACKSON WALTER,
Director, Office of Government Ethics,
Washington, D.C.

MARCH 5, 1981.

DEAR MR. WALTER: The purpose of this letter is to inform you of the steps I intend to take in order to avoid the possibility of any actual or apparent conflict of interest between my personal financial interests and the duties I will perform if confirmed to be Under Secretary of Agriculture for International Affairs and Commodity Programs.

As indicated on my SF-278, Financial Disclosure Report, I own an interest, as one of the beneficiaries of the William G. Lodwick trust, in 1200 Acres of farmland in Lee County, Iowa. This land is used to raise corn, soybeans, and wheat, and is operated on a crop share basis. In recent years, I have received beneficial distributions from this trust property. I have also served as trustee of the William G. Lodwick trust, and have received a trustee's fee for this service; in this manner, I have actively participated in the management of the farming operation. Upon my confirmation as Under Secretary for International Affairs and Commodity Programs, I will resign my position as trustee of this trust. I will also abstain from active participation in the management of these farming operations during my tenure as Under Secretary, and will receive only my proportional share of the trust distributions. In no event will my income from the trust exceed an annual rate of return of eight percent (8 percent) of the value of my proportional share of the trust assets, during the period of my Government service as Under Secretary.

I also own, jointly with my sister, 480 Acres of farmland known as LaCrew Acres, Inc., also located in Lee County, Iowa. This land is used to raise primarily corn and soybeans, and is managed by a third party. During my tenure as Under Secretary, I will abstain from all active participation in the management of this farm property, and will continue to receive only my proportional share of the income from the property, and in no event will my income exceed an annual rate of return of eight percent (8 percent) of the value of my ownership interest in this property.

My wife owns separately 120 acres of farmland also located in Lee County, Iowa. This land is managed by my wife, operated by a third party, and used to raise corn, soybeans, and wheat. I will likewise abstain from active participation in the management of this land during my service as Under Secretary. I will also, during my tenure as Under Secretary,

I will also, during my tenure as Under Secretary, recuse myself from participation in any particular matter which may arise within the Department of Agriculture concerning farming or agricultural production in Lee County, Iowa, where all lands owned by the William G. Lodwick trust and by La Crew Acres, Inc., and the land separately owned by my wife, are located.

I also own, jointly with my sister, 640 Acres of land located in Sherman County, Texas, which is managed and operated on a rental basis. Part of this is pasture for which we receive cash plus a percentage of the yield. Here too I will abstain from active participation in the management of these lands during my service as Under Secretary. During my period of service as Under Secretary, I will receive no income from this property which exceeds an annual rate of return of eight percent (8 percent) of the value of my ownership interest. I will likewise recuse myself from participation in any particular matter which may arise within the Department of Agriculture concerning farming or agricultural production in Sherman County, Texas, where these lands are located.

I also own a one-sixth interest in Pork Production, Inc., a firm located in Iowa which raises, finishes, and markets approximately 1,000 hogs per year. I hold no office in this concern, but I do serve as a member of the corporation's Board of Directors. While I now participate in the firm's management, I will abstain from such involvement during my service as Under Secretary and will resign my membership on the Board of Directors upon my confirmation as Under Secretary. My only income from this interest comes in the form of dividends, which I will continue to receive while I serve as Under Secretary.

Neither I nor any of my farming or business interests currently have any indebtedness under or participation in any USDA lending or farm price support programs. Further, no loans or other participation in such programs will be sought during my service as Under Secretary.

With the exception of the passive interests I will retain in the above referenced farming and farm-related operations, I intend to resign from all positions I currently hold. I will also refrain from all active management, and will render no personal services of any kind, in connection with any of the farm properties, agriculture operations, or other business ventures in which I own financial interests, or in

return for any income which I receive from such operations during my tenure as Under Secretary of Agriculture.

In addition, I intend to recuse myself, on a case-by-case basis, in any matter in which, in order to avoid the possible appearance of impropriety, it appears to me desirable that I do not personally or substantially participate, despite the lack of any actual conflict of interest. I believe that this general policy, to which I am committed, will avoid not only the occurrence of any actual conflict of interest, but even the possible appearance of any conflict between my duties as an officer of the Government and my personal financial interests, while at the same time enabling me to participate fully in generic policy decisions as Under Secretary of Agriculture for International Affairs and Commodity Programs.

Sincerely,

SEELEY G. LODWICK.

Form Approved OMB No. 3060-101		Page
Reporting Status (Check Appropriate Box) <input type="checkbox"/> Incumbent <input checked="" type="checkbox"/> New Entrant, Northern, or Candidate		Agency Use Only Date of Filing (Month Day Year) MAR 5 1981
Reporting Individual's Name Last Name First Name and Middle Initial		NOTE All schedules must be filed. Enter "None" in areas or across schedule where appropriate.
Termination Report <input type="checkbox"/>		

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11 STATEMENT

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BANK STATEMENT RE LODWICK FAMILY
FINANCIAL HOLDINGS FOR 12/1/81-2/28/82

Freedom of Information Act - [5 U.S.C. 552(b)]

B-1 National security classified information [(b)(1) of the FOIA]

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BANK STATEMENT RE LODWICK FAMILY
FINANCIAL HOLDINGS FOR 3/1/82-5/31/82

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BANK STATEMENT RE LODWICK FAMILY
FINANCIAL HOLDINGS FOR 6/1/82-8/31/82

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14 STATEMENT	5	ND	B6	239
BANK STATEMENT RE LODWICK FAMILY FINANCIAL HOLDINGS FOR 9/1/82-11/30/82				

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BANK STATEMENT RE LODWICK FAMILY
FINANCIAL HOLDINGS FOR 12/1/82-2/28/83

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<i>NO Document Description</i>	<i>pages</i>		<i>tions</i>	
16 FORM	4	ND	B6	241
FINANCIAL DISCLOSURE REPORT (SF278)				

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~~70-111-100~~ Em:

2

Davis:

67-76:

draw distinction: full time

major
passive investment
more trusts fee

5

- passive
- manager
- no fee

3

6

- which farm?
- what does it grow?
- how affected by ITC work?
- know of past history?
- earned income limitation?
- how much of time involved w/ farm?

W. G. Cochran Trust: 1200 Acre corn, soybeans, flax
 soybeans, winter, alfalfa wheat

✓ OGE: 208(b)(1) waiver?

✓ OGE:

involved in farms again?

~~X 9,832~~ ~~unofficial distribution~~

→ other inc for S interest in trust

- 19 U.S.C. 1330

Thursday A.M. return

from (S '82 Monday A.M.)

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RE REQUIRED FINANCIAL DOCUMENTS

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